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October 25, 2002

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte Presentation*
In the Matter of Review of the Section 251 Unbundling
Obligations of Incumbent Local Exchange Carriers,
CC Docket Nos. 01-338, 96-98, 98-147

Dear Ms. Dortch:

On October 24, 2002, Donna Sorgi, Kim Scardino, and Larry Rogers of WorldCom, Inc. and Ruth Milkman, Lawler, Metzger & Milkman, counsel to WorldCom, met with Scott Bergmann, Jeffrey Carlisle, William Maher, and Brent Olson to discuss the above-captioned proceeding. In the meeting, WorldCom discussed UNEs that are required for the provision of DSL services, as described in the attached presentation.

Pursuant to section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this letter is being provided to you for inclusion in the public record of the above-referenced proceeding.

Sincerely,


Ruth Milkman

Enclosure

cc: Scott Bergmann
Jeffrey Carlisle
William Maher
Brent Olson

WorldCom DSL

Larry Rogers

Director, WorldCom DSL

FCC Briefing

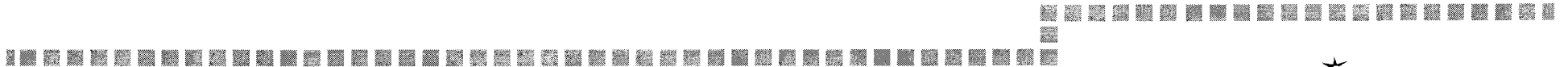
Oct 24, 2002

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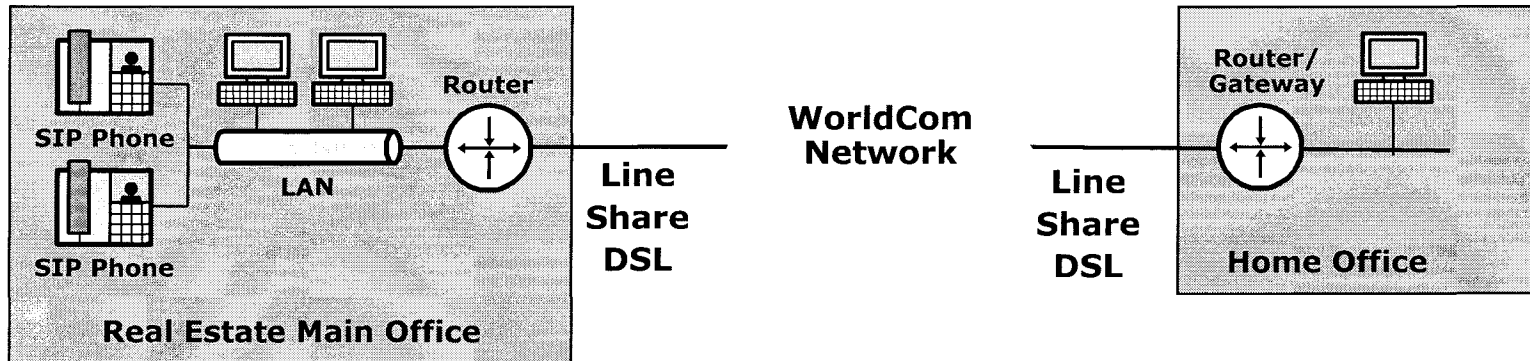
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Distinguishing Aspects of WorldCom DSL

- Competitive Option for Businesses and ISPs
- Nationwide Coverage / Single Supplier
 - Key for ISP & Regional/National Enterprises
- Owned and Managed Facilities from DSLAM to WCOM Backbone
- DSL Access to Multiple Network Backbones
 - Important for business to connect to existing infrastructure
- WorldCom Service Levels
 - Business or consumer grade
 - Customers willing to pay for the features

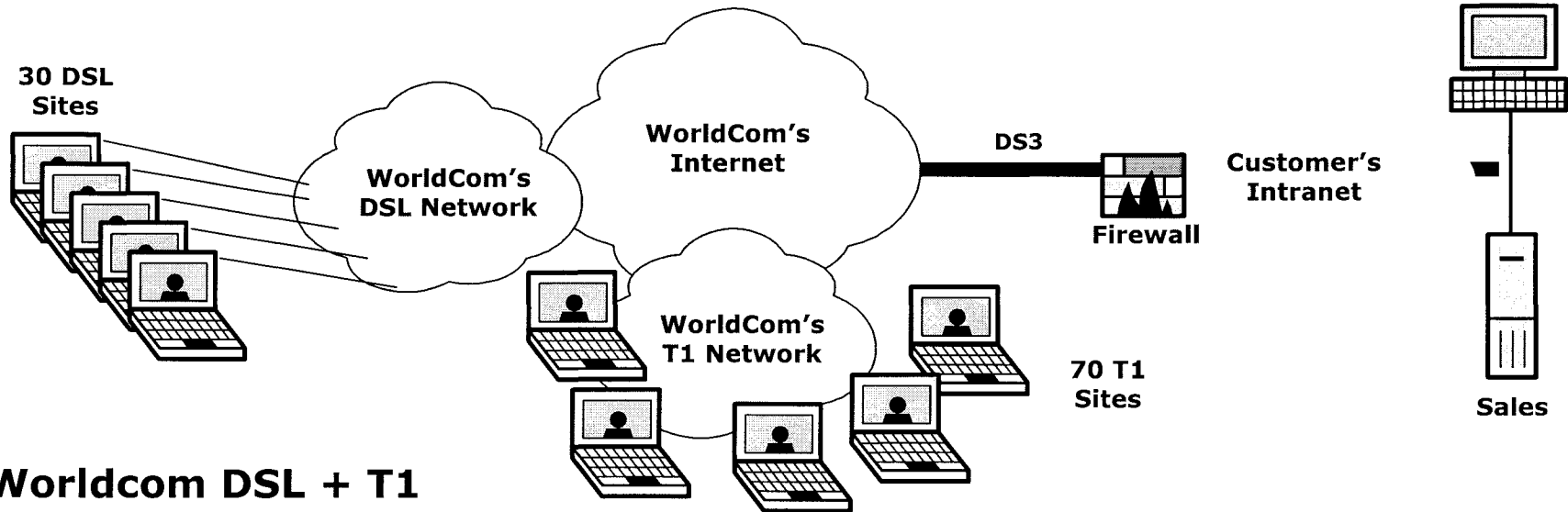


Business: Line Sharing Delivers Benefits to Businesses



- Typical customer: two site real estate company
- Wcom Business DSL Line Sharing Offering
 - Each site 1.5M down/256k up bandwidth
 - Price - \$75
 - Service Guarantees
 - Integrated access to value added service(VoIP, IP Centrex)
- If forced to use xDSL loops:
 - absorb ~\$330 install costs
 - 30% increase in monthly costs
 - not feasible with this market
- Alternative is ILEC Consumer Grade
 - 1.5M down/256k up
 - Price - \$60 per month (VZ Web)
 - No service guarantees
 - No integrated access to value added services(VoIP, IP Centrex)

Large Businesses Benefit from WCOM DSL

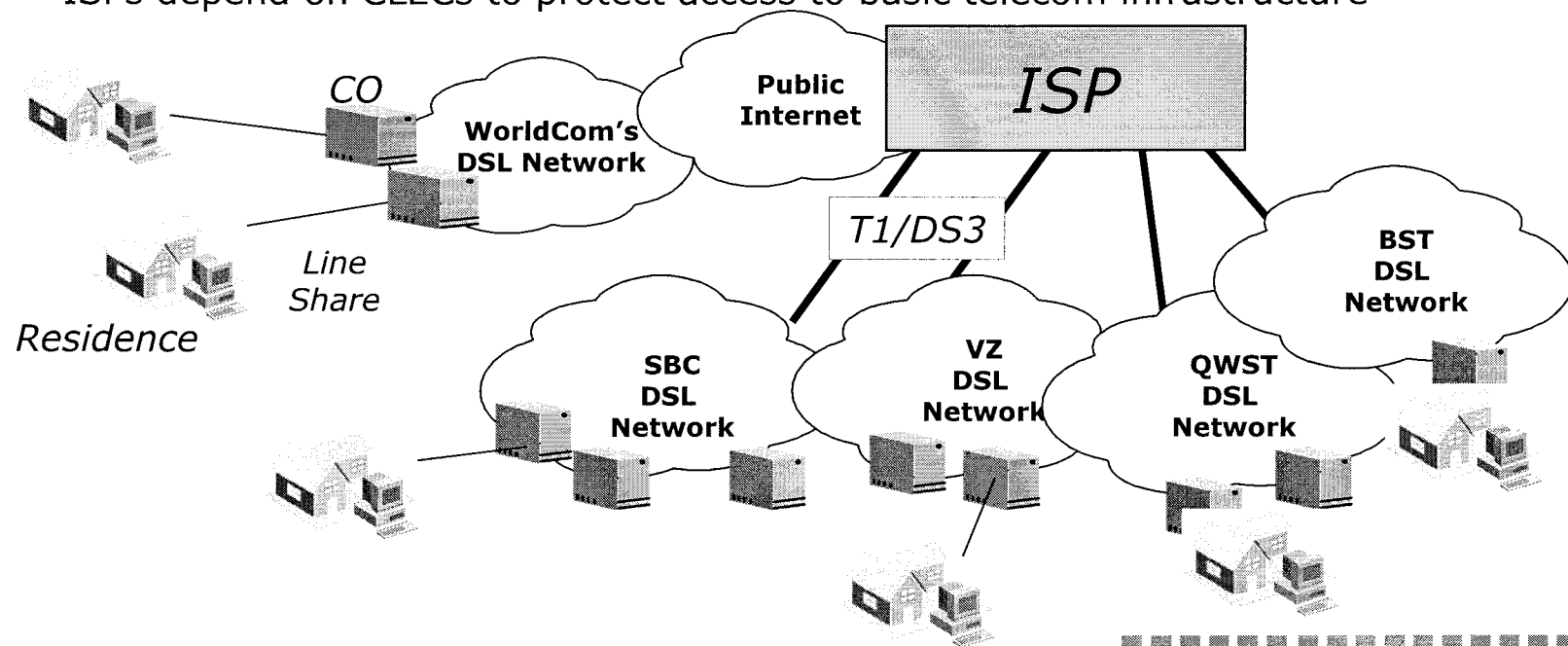


Worldcom DSL + T1

- 30 DSL Sites @ \$175
- 70 T1 Sites @ \$800
- 1 DS3 @ \$2000
- Total Monthly Cost = \$63,250
- ILEC T1 offering - 100 T1's = \$82,000
- Net savings of \$18,750 per month

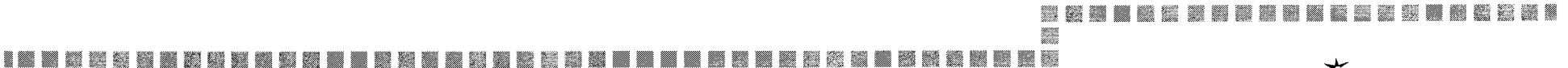
ISP Competition with ILEC depends on Line Sharing

- **ISPs utilize WorldCom's broad product offering**
 - Consumer to business grade services based on line shared loops
- **WorldCom provides nation-wide, single supplier of line shared service**
 - Low investment to get started – encourages innovators
- **Without Line Sharing, ISPs will not be able to compete with ILEC offering on price**
 - ISPs depend on CLECs to protect access to basic telecom infrastructure



WorldCom Must Have Access to DSL loops, Including Line Sharing

- **CLECs need access to ILEC network to provide DSL**
 - ILECs' own the last mile; CLECs can not duplicate access
- **CLECs are impaired without access to line-shared loops**
 - Second loop often unavailable (no facilities)
 - Cost of second loop materially increases provisioning costs, and decreases efficiency
- **Delivering Line Sharing UNE to CLEC is not a substantial incremental burden**
 - Sunk Investment/Minimal ongoing investment
 - CLECs have equipment deployed in ILEC CO's
 - Minimal ongoing ILEC resources to support new customers
- **Benefits of Line Sharing competition far outweigh the minimal costs**



[illegible]

WorldCom DSL

Larry Rogers

Director, WorldCom DSL

FCC Briefing

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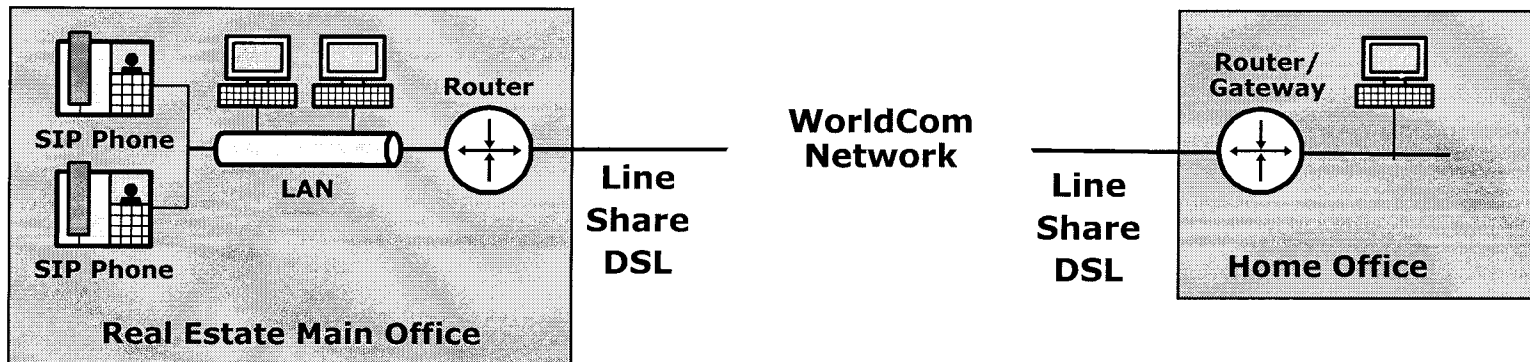
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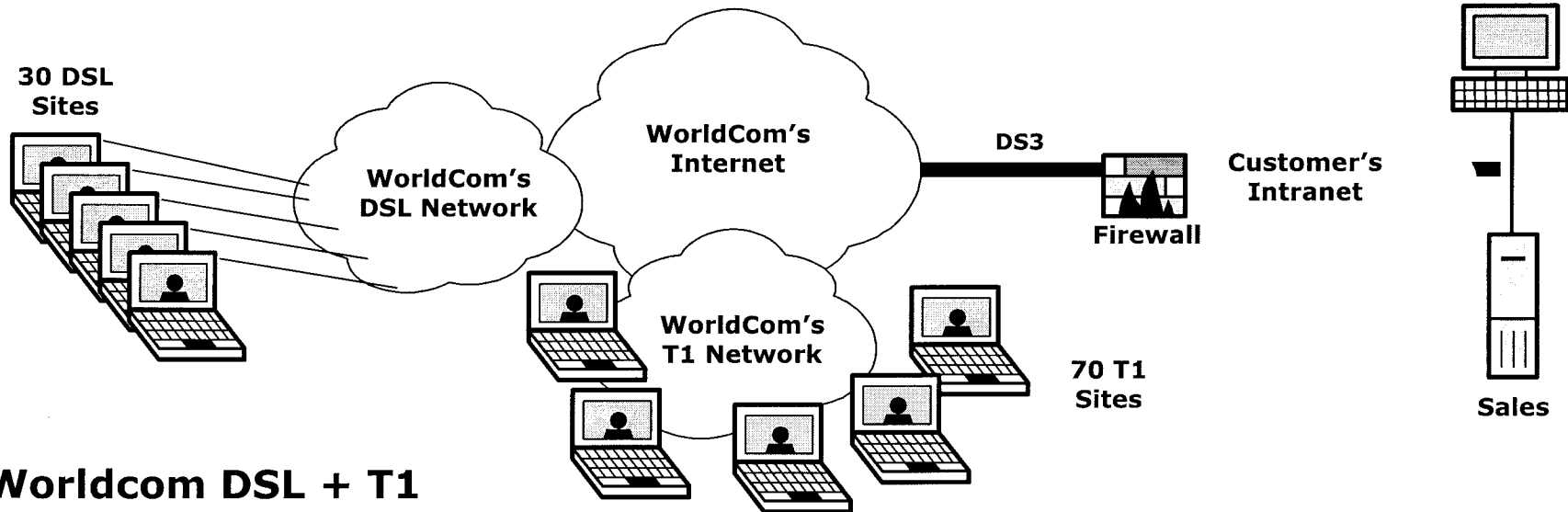


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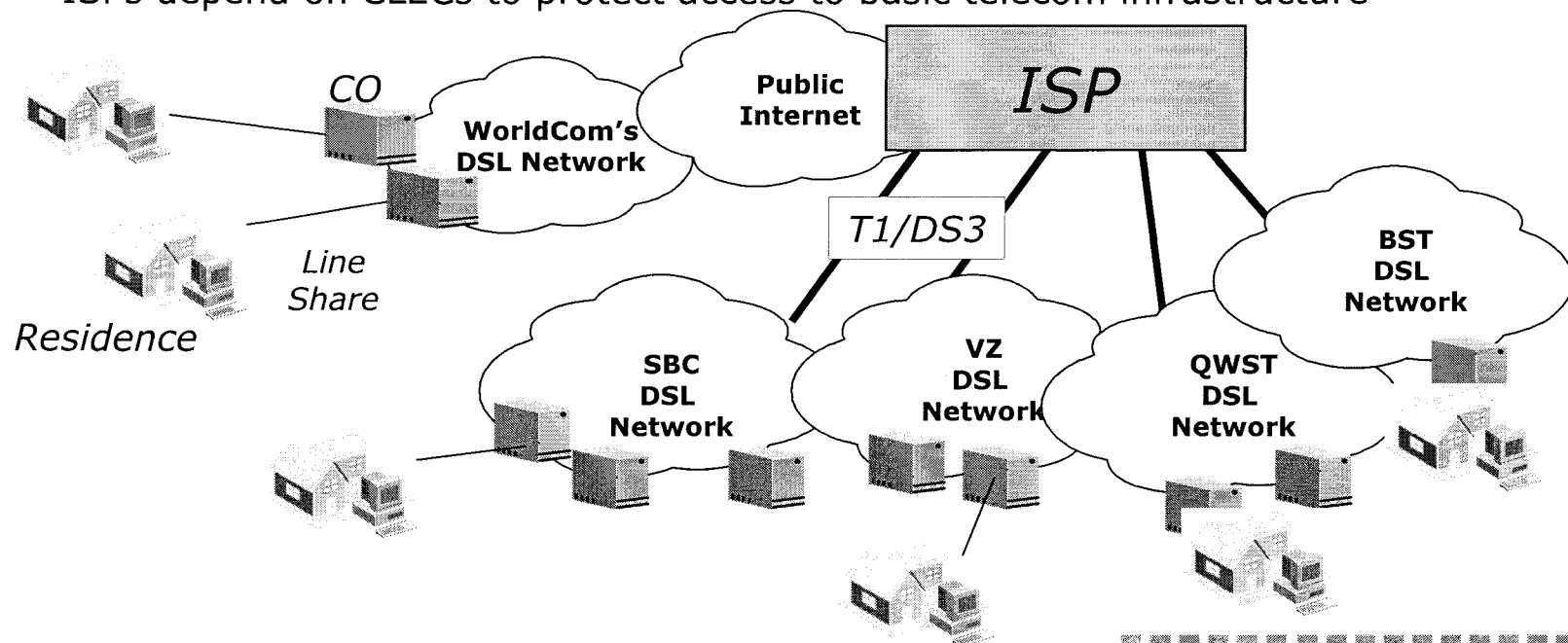


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